

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

JUSTIN BLAKE,
Plaintiff,
v.

Case No.: 22 CV 970

DAVID BETH, in his individual capacity
and official Capacity, COUNTY OF
KENOSHA a municipal corporation, KYLE
BISSONNETTE in his individual
and official capacity, JACOB DiCELLO in
his individual and official capacity, GLORIA
GALVAN in her individual and official
capacity, DEREEMEYUN HAYNES in his
individual and official capacity, JEREMY
MAY in his individual and official capacity,
JESSICA BERGMANN in her individual
and official capacity, NAPHCARE JOHN
DOE OFFICERS in the Kenosha County
Sheriff's Department 1-10, WISCONSIN
COUNTY MUTUAL INSURANCE
COMPANY, ABC INSURANCE
COMPANY, and XYZ INSURANCE
COMPANY,

Defendants.

**PLAINTIFF'S MOTION FOR AN EXTENSION OF TIME
TO FILE EXPERT WITNESS LIST**

Plaintiff Justin Blake ("Blake" or "Plaintiff"), by and through its undersigned counsel, Cade Law Group LLC and Motley Legal Services, files this motion requesting a forty-five (45) day extension to file Blake's Expert Witness list after the Hon. Pamela Pepper issues a decision regarding's Blakes's Motion for Leave to Amend the Complaint. . Plaintiff seeks an extension for the following reasons:

1. Counsel for Plaintiff filed a Motion for Leave to Amend on March 15, 2023. Defendant's Counsel wrote a letter on April 17, 2023 informing the Court that that Defendants David G. Beth, County of Kenosha, Kyle Bissonnette, Jacob DiCello, Gloria

Galvan, Dereemeyum Haynes, Jeremy May, John Doe Officers in the Kenosha County Sheriff's Department 1-10, and Wisconsin did not oppose Plaintiff's motion.

2. On April 29, 2023, Blake requested that the Court issue a Summons to the Kenosha Visiting Nurse Association.

3. The Court has yet to issue an order regarding the Motion for Leave to Amend the Complaint.

WHEREFORE, for the foregoing reasons, Plaintiff very respectfully requests that the Court grant its motion for an extension of time of forty-five days (45) after the Honorable Pamela Pepper issues her decision regarding Blake's Motion for Leave to Amend the Complaint, to file its Expert Witness List.

Dated this 15th day of June, 2023.

CADE LAW GROUP LLC

By: /s/Antonique C. Williams

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